

**From:** [Clark, Jacqueline](#)  
**To:** [David L. Rieser](#)  
**Cc:** [Faryan, Steve](#); [Ken Rose](#); [Kenney, Thomas](#)  
**Subject:** Additional Edits re: Wedron, IL: Illinois Railway Scope of Work  
**Date:** Thursday, September 19, 2013 2:19:00 PM  
**Attachments:** [WEDRON SOW 19Sep2013 EPA Edits2.docx](#)  
[RCRA Section 7003 AOC for Wedron Illinois Railway final.docx](#)

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David – attached is a final AOC, accepting the minor edits you provided earlier this week and including some new formatting edits. I'm also attaching the workplan with some additional edits. We accepted the edits provided to Steve Faryan earlier this week and proposed our current edits in redline. The edits are consistent with prior comments and discussions among the parties. Per my management, if possible, please send me a final workplan today or early tomorrow so I can begin sign-off tomorrow. I am out of the office tomorrow, but will try to check email regularly. I can be reached by cell phone after 4:30 today and all day tomorrow: 773.474.1837.

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**From:** David L. Rieser [<mailto:DRieser@muchshelist.com>]  
**Sent:** Tuesday, September 17, 2013 11:03 AM  
**To:** Clark, Jacqueline  
**Subject:** FW: Wedron, IL: Revised Illinois Railway Scope of Work dated 16Sept2013 attached [IWOV-MS1.FID373208]  
**Importance:** High  
Per our discussion

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**From:** Smith, Randall T. [<mailto:SmithRT@cdmsmith.com>]

**Sent:** Monday, September 16, 2013 4:51 PM

**To:** 'Faryan, Steve' ([faryan.steven@epa.gov](mailto:faryan.steven@epa.gov))

**Cc:** Ken Rose; David L. Rieser; Albrecht, Chris; Grabs, John; Andy Engeman; Ken Koff; Sandra Remy

**Subject:** Wedron, IL: Revised Illinois Railway Scope of Work dated 16Sept2013 attached

**Importance:** High

Hello Mr. Faryan,

On behalf of Mr. Ken Rose for Illinois Railway (IR), attached please find the revised Draft Scope of Work (SOW) for the Wedron, Illinois field investigation activities. This SOW, dated September 16, 2013, has been revised to address the comments contained in the email dated Thursday Sept. 12, 2013 from Jacqueline Clark to David Rieser.

The attached draft SOW is submitted as a Microsoft Word document, using the "Track Changes" feature to highlight notable revisions. Minor text edits and word changes have been made without highlighting. Also attached is a revised figure showing the locations for the geophysical survey and direct push subsurface sampling.

We believe the attached SOW reflects all of your requests for modification, except for the following important exceptions:

Your item #6a, regarding the field sampling plan, requests that "... for each historical feature identified for investigation, collect a boring from the center of the location." IR respectfully disagrees with this suggestion. If the geophysical investigation infers an underground tank is present, IR will not want to either puncture or otherwise damage the tank with the direct push rig or encounter refusal; instead IR proposes to install the boring immediately adjacent to the anomaly. Any subsequent tank removal activity will be conducted per Illinois requirements.

Your item #9 requests that "...IR will begin soil boring activities before the geophysical report is complete." IR respectfully disagrees with this suggestion. IR proposes to wait the few extra days to receive the fully evaluated and reviewed geophysical results from the subcontractor before finalizing any field investigation decisions and before mobilizing for intrusive work. IR will review field investigation responses to the geophysical results with EPA before field work is finalized.

Your item #13 requests IR to "...collect water table elevation data and prepare and submit to EPA a water table elevation contour map." Yes, IR will collect water table elevation data and will present the results in tabular form; however, any interpretive elevation contouring based on IR's linear well placements will be misleading at best – especially since the line of IR wells will be generally cross-gradient to the inferred east-to-west groundwater flow direction (per attachment labeled "FX\_Groundwater\_Flow (4).pdf" to email dated September 9, 2013 from Steve Faryan to Ken Rose).

IR recommends that all new groundwater monitoring wells installed as part of this Wedron

investigation, by all involved parties, be included in a comprehensive town-wide groundwater elevation survey conducted by a single entity during a single mobilization. I hope these clarifications are helpful.

Regards,  
Randy Smith

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**From:** David L. Rieser [<mailto:DRieser@muchshelist.com>]  
**Sent:** Thursday, September 12, 2013 3:08 PM  
**To:** Andy Engeman; Ken Rose; Ken Koff; Sandra Remy  
**Subject:** FW: Wedron IR SOW [IWOV-MS1.FID373208]

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**From:** Clark, Jacqueline [<mailto:clark.jacqueline@epa.gov>]  
**Sent:** Thursday, September 12, 2013 4:06 PM  
**To:** David L. Rieser  
**Cc:** Kenney, Thomas; Faryan, Steve  
**Subject:** RE: Wedron IR SOW [IWOV-MS1.FID373208]

David – below are EPA’s comments on the latest IR work plan. Ideally, we’d like to see a revised work plan with these comments incorporated when we talk on Monday. Monday we are available for a call from 8:30-10 am or anytime after 11 am. Please let me know what works for you and IR participants.

1. Include a schedule for all submissions and activities identified in the work plan, either within the body of the work plan or as an attachment. The timeframes should be tight to ensure field work begins in October and is completed this fall/early winter
2. Include updated figures/maps as attachments to the work plan, incorporating comments below
3. Revise work plan/schedule to reflect that QAPP will be submitted and approved by EPA before field work begins
4. Include reference to using an EM-61 metal detector in Geophysical Survey Section as the time-domain EM model, or specify a different model
5. In Geophysical Survey Section insert *and* between “electromagnetics” and “flux-gate”
6. Sampling Plan Section and Phase 1 Section should be revised to include the following sampling/investigation parameters:
  - a. For each historical feature identified for investigation, collect a boring from the center of the location. If a PID reading from that boring is greater than 5 ppm, step out and complete additional borings and collect additional samples to delineate the extent of contamination.
  - b. At the April 2013 LUST location, collect a boring in the middle of the location and directly north and south of the location. If a PID reading from a boring is greater than 5 ppm, step out and collect additional samples to delineate the extent of contamination.
  - c. For the location identified by an EPA geophysical survey in May 2013, complete additional geophysical work to identify a potential UST. Then complete three borings – one on each side of the location and one in the middle. If a PID reading from a boring is greater than 5 ppm, step out and complete additional borings and

- collect additional samples to delineate the extent of contamination. If an UST is identified, contact the OSFM for tank removal.
- d. State how many borings, total, will be collected (I think they need to specify a minimum number of borings – will be hard to come up with an actual number)
7. Use ultraRAE or similar ppb reading PID for investigation
8. In the Phase I Section revise to indicate that if only one PID reading occurs, then samples will be collected at the point of the PID reading and just above the water table
9. Indicate in the Phase I Section that IR will begin soil boring activities before the geophysical report is complete
10. Under Phase 3 Section delete the phrase “IEPA-approved”
11. Revise work plan to reflect borings will be installed to the water table or bedrock and monitoring wells will be screened across the water table, likely below top of bedrock
12. Note that EPA will need access to any installed monitoring wells for future survey and sampling purposes
13. Under Phase 3 Section EPA would like IR to collect water table elevation data and prepare and submit to EPA a water table elevation contour map
14. Under Field Assumptions:
- a. The 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> bullets should refer to both borings and monitoring wells
  - b. The 3<sup>rd</sup> bullet should indicate that any locations not accessible by a truck mounted drill rig will be evaluated for access to install monitoring wells in another manner
15. Under Task 3:
- a. The 4<sup>th</sup> bullet should include boring/sampling locations *and depths*
  - b. The 8<sup>th</sup> bullet should include PID data
  - c. The 9<sup>th</sup> bullet should state Geophysical Survey *results*

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